

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ROBERT P. "SKIP" CUMMINS

Plaintiff

-Against-

**SUNTRUST CAPITAL MARKETS, INC.,
AMIT HAZAN, AND JONATHAN BLOCK**

Defendants

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/2/07

Case Number: 07 CV 4633 (JGK)

JURY DEMAND

PLAINTIFF'S PROPOSED SCHEDULING ORDER

The following schedule shall govern the disposition of this case:

1. *Except for good cause shown,*
New Parties shall be joined by:
2. *All including & post discovery*
Discovery shall be completed by:
3. *Except for good cause shown*
Plaintiff shall file any amendment to pleadings without leave of Court by:
4. *Except for good cause shown*
Defendants shall file any amendment to pleadings without leave of Court by:
5. Expert Witnesses for Plaintiff shall be designated and a report furnished by:
6. Expert Witnesses for Defendants shall be designated and a report furnished by:
7. Rebuttal Experts for Plaintiff shall be designated and a report furnished by:

October 31, 2007

270 days from the date of the filing
of the Proposed Schedule. *As is*

60 days prior to the close of
Discovery *Ja*

40 days prior to the close of
Discovery *Jan*

90 days prior to the close of
Discovery

30 days after Plaintiffs' Expert Witnesses are designated

30 days after Defendants' Expert
Witnesses are designated

8. Dispositive motions must be filed by:

September 5, 2008
~~20 days after the close of discovery~~

9. All other pretrial motions (including *Daubert* motions, but not including motions in limine) will be filed by:

30 days after decision of any dispositive motion or by
~~20 days after the close of discovery~~

10. Joint Pretrial Order shall be filed by:

~~30 days after the close of discovery~~

Signed this _____ day of _____, 2007.

9/26/08, whichever is later.

Honorable John G. Koeltl
United States District Judge

Respectfully submitted this
26th day of July, 2007,

/s/ Ashton Bachynsky
Julius Glickman (JG 2972)
Ashton Bachynsky (AB 7998)
GLICKMAN & HUGHES, L.L.P.
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713.658.1122
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11. The parties shall be ready for trial on 48 hours notice or 10/17/08, or 6 weeks after the decision on any dispositive motion, whichever is later.

-and-

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New York, NY 10022-6102
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ATTORNEYS FOR PLAINTIFF

So ordered

8/1/07
Jr G. Koeltl
U.S.D.J.